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GOOGLE LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO**

ANIBAL RODRIGUEZ, *et al.* individually and  
on behalf of all other similarly situated,

Plaintiffs,

vs

GOOGLE LLC, *et al.*

Defendant.

Case No. 3:20-CV-04688 RS

**DECLARATION OF STEVE GANEM IN  
SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO SEAL  
PORTIONS OF PLAINTIFFS' MOTION  
FOR RELIEF FROM CASE  
MANAGEMENT SCHEDULE**

*[Declaration of Eduardo E. Santacana in Support  
of Plaintiffs' Administrative Motion to Seal filed  
concurrently herewith]*

Judge: Hon. Richard Seeborg

Courtroom: 3, 17th Floor

Date: December 9, 2021

Time: 1:30 p.m.

1 I, STEVE GANEM, declare:

2 1. I am a Group Product Manager at Google LLC (“Google”) with supervisory  
3 authority concerning Google Analytics for Firebase (“GA for Firebase”). In my role as Group  
4 Product Manager, I am familiar with Google’s practices regarding the treatment of sensitive  
5 business and technical information.

6 2. Unless otherwise stated, the facts I set forth in this declaration are based on my  
7 personal knowledge or knowledge I obtained through my review of corporate records or other  
8 investigation. If called to testify as a witness, I could and would testify competently to such facts  
9 under oath.

10 3. I submit this declaration in support of the Administrative Motion to Seal Portions of  
11 Plaintiffs’ Motion for Relief from Case Management Schedule filed by Plaintiffs. ECF No. 152.

12 4. I have reviewed portions of (1) Plaintiffs’ Motion for Relief from Case  
13 Management Schedule (“Motion for Relief”) (ECF No. 152-4); (2) Declaration of Mark C. Mao  
14 in Support of Plaintiffs’ Motion for Relief (“Mao Declaration”) (ECF No. 152-6); and  
15 (3) Exhibits A–F to the Mao Declaration (ECF Nos. 152-8, -10, -12, -14, -16, -18) that have been  
16 designated for sealing.

17 5. **Exhibit A** contains a discussion between several Google product managers and  
18 other employees, which discloses confidential and proprietary information concerning the  
19 technical underpinnings of several of Google’s products and settings, as well as the interaction  
20 between them. The thread also discloses Google’s product design and strategy, including  
21 consideration of specific risks. Google considers this information proprietary, and it is kept  
22 confidential both internally at Google and in litigation, and it should be shielded from  
23 unnecessary public disclosure.

24 6. **Exhibit B** contains a discussion between a Google software engineer and myself  
25 that discloses confidential information about Google’s internal technological systems and  
26

1 processes used to store data Google receives via its products, including consideration of specific  
2 risks. Google considers this information proprietary, and it is kept confidential both internally at  
3 Google and in litigation, and it should be shielded from unnecessary public disclosure.

4 7. **Page 6, lines 24-25 of Plaintiffs' Motion for Relief**, at "REDACTED" ("... raise  
5 concerns about the" [REDACTED] *Id.* ¶ 12, Ex. B . . .), comprises quotes from and  
6 characterization of Exhibit B that are confidential and proprietary for the same reasons applicable  
7 to Exhibit B, as stated in paragraph 6 above.

8 8. **Exhibits C & D** are parts of the same email thread between a Google engineering  
9 manager, product manager, and content strategist. The thread discloses Google's internal  
10 technological systems and processes used to store data Google receives via its products, including  
11 the relationship between those products and processes and other proprietary Google functions.  
12 The thread also discloses Google's product design and strategy, including consideration of  
13 specific risks. Google considers this information proprietary, and it is kept confidential both  
14 internally at Google and in litigation, and it should be shielded from unnecessary public  
15 disclosure.  
16

17 9. **Exhibit E** is an email thread between a Google software engineer and myself and  
18 other Google employees. The thread discloses Google's product design and strategy for a  
19 specific Google product, including the consideration of specific risks. This is information that is  
20 kept confidential both internally at Google and in litigation. That part also reveals confidential  
21 and proprietary information concerning Google's methods for maintaining and categorizing user  
22 data and identification markers, which Google considers proprietary information that should be  
23 shielded from unnecessary public disclosure.  
24

25 10. **Page 6, lines 26-27 of Plaintiffs' Motion for Relief**, quotes from Exhibit E and is  
26 thus confidential and proprietary for the same reasons stated in paragraph 9 above.  
27

1           11. **Exhibit F** is a performance review of a Google product manager (PM) compiling  
2 information from projects and work spanning several years. Exhibit F not only discloses highly  
3 confidential, proprietary information about the technology underlying the product managed by the  
4 PM but also about the technology of related products, functions, and services, including Google's  
5 technological systems and processes used to store data Google receives via its products.  
6 Exhibit F also contains proprietary information concerning Google's product design strategy,  
7 business strategy, and consideration of various risks. Google considers this information  
8 proprietary, and it is kept confidential both internally at Google and in litigation, including  
9 because it is the type of information that could cause harm to Google if obtained by a competitor.  
10

11           12. Exhibit F also contains numerous references to and uses of internal project names  
12 Google does not discuss publicly, as well as the technical and strategic details of such projects  
13 which Google likewise does not reveal publicly. Revealing internal project names or their  
14 functions would present a serious risk of irreparable harm to Google. Specifically, an individual  
15 interested in improperly accessing Google's systems could target particular proprietary  
16 documents and information for improper uses if he or she knew Google's confidential internal  
17 names, like ones in Exhibit F. Thus, it is very important that internal names and project details  
18 not be revealed outside of Google. The fact that all of this confidential technical information and  
19 strategy discussion is compiled in one location makes it particularly important that this document  
20 not be disclosed publicly because it would facilitate a bad actor in improperly using the  
21 information to harm Google, and it means no more limited sealing would appropriately protect  
22 Google's confidential and proprietary information.  
23


24           13. Exhibit F also reflects Google's confidential business strategy and approach to  
25 internal employee review and promotion. And Exhibit F contains highly confidential personal  
26  
27  
28

1 information about a third party—the Google PM who is the subject of the performance review.  
2 Exhibit F discloses the PM’s performance at Google, private discussion of areas for improvement  
3 and advancement potential, along with other private work performance information. The PM could  
4 easily be identified and related to the private information contained within Exhibit F if it becomes  
5 publicly available. This is the type of information that is considered highly confidential internally at  
6 Google, is not widely disclosed, discussed, or distributed, and is regularly protected from  
unnecessary public disclosure.

7 14. Page 15, lines 20-23 of Plaintiffs’ Motion for Relief, at “REDACTED” (“Google  
8 released [REDACTED] *Id.* After that point, Google apparently [REDACTED] *Id.*”), characterizes  
9 Exhibit F and references and discusses a specific confidential and proprietary Google project.  
10 Google does not discuss this project or use the project name publicly, and revealing the internal  
11 project name or technical function would present a serious risk of irreparable harm to Google for the  
12 reasons stated in paragraph 12 above. The confidential and proprietary project also discloses  
13 Google’s product design and strategy, which is kept confidential both internally at Google and in  
litigation.

14 I declare under penalty of perjury under the laws of the United States of America that the  
15 foregoing is true and correct.

16  
17 Executed November 5, 2021, at San Francisco, California.

18  
19  
20   
STEVE GANEM